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February 9, 2015

Via ECF

The Honorable Sandra L. Townes
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Roman Johnson*
Case No. 14-CR-278 (SLT)

Dear Judge Townes:

As Your Honor is aware, this law firm represents the defendant Roman Johnson in the above-referenced criminal action. We write on behalf of both parties to respectfully request that the upcoming status conference, scheduled for Tuesday, February 10, 2015, at 5:00 p.m., be adjourned until Wednesday, March 4, 2015. The parties have worked out a disposition in this case and a plea has been scheduled for March 4, 2015, at 12:00 p.m., before Magistrate Judge Marilyn D. Go. In light of the anticipated resolution of this matter, we respectfully submit that tomorrow's status conference is unnecessary. Of course, should the Court deny this request, the parties are prepared to appear as scheduled.

We have advised the defendant of his rights under the Speedy Trial Act, the defendant understands those rights, and the defendant consents to excluding the time between February 10, 2015, and March 4, 2015 in computing the time within which trial must commence. Under these circumstances, the parties respectfully submit that an adjournment would serve the ends of justice and the defendant by giving the parties adequate time to focus on resolving the outstanding issues without unnecessarily taxing the resources of the Court.

Thank you for your consideration.

Very truly yours,

GOTTLIEB & GORDON LLP

/s/ Robert C. Gottlieb (RG1930)

Robert C. Gottlieb (RG1930)

cc: Bryan Fields, A.U.S.A. (via ECF and email)